

REMARKS

Reconsideration and removal of the grounds for rejection are respectfully requested. Claims 1-15 and 17-46 were in the application, claims 1-15 and 17 were withdrawn, claims 18-21, and 23-26 have been amended, claims 27-29 and 33-46 have been cancelled, and new claims 47 and 48 have been added.

The examiner objected to Figure 5, and a replacement sheet corrected per the examiners' suggestion is enclosed herewith.

The specification has been amended per the examiners' suggestion to spell out the various abbreviations used in the application, as well as to capitalize JAVA with the generic description, as well as to provide proper attribution for the Java® trademark. Consequently, the objections are now moot.

Claim 18 has been amended to incorporate the limitations of dependent claims 19, 20, 27, 28 and 29. Method claims 33-46 have been deleted and replaced by a single new independent method claim 49 of corresponding scope to amended claim 18.

Claim 18 has also been amended to include features found in the description which are believed to further distinguish the invention from Coleman, as will be discussed further below. In particular, claim 18 now specifies that the input processor is further configured to: (1) Add static data to the data corresponding to the received invoices when processed into the standard intermediate form; (2) Add dynamic data to the data corresponding to the received invoices when processed into the standard intermediate form; and (3) Validate the data corresponding to the received invoices when processed into the standard intermediate form before transmission by the transmitter to the party being invoiced. Support for feature (1) can be found in previous claim 28 and also on page 10, line 33, page 11, line 1 and step s204 shown in Figure 8. Feature (2) finds support on page 11, line 1 and step s205 shown in Figure 8. Feature (3) finds support on page 11, lines 2,3 and step s207 shown in Figure 8. No new matter is involved in this amendment.

Claims 18 -46 were rejected as being anticipated by U.S. Patent no. 5,708,828 to

Coleman.

The applicant has given consideration to the examiners comments that the applicants invention relates to data, however to characterize this as "nothing more than data is an overly broad interpretation, There are myriad subsets of data, just as there are myriad subsets of devices, and as should be understood, it is the language of the claim that is looked to for direction as to the subset of data, or devices, to which a claim is directed, and the Examiner cannot ignore claim language, as this sets the bounds of the invention. The Examiner thus must take into consideration that certain subsets of data will require different processing than other subsets of data, and just as with devices, have different problems, advantages and features associated with that particular subset. This is particularly important when making a determination of anticipation, as the legal requirements for anticipation apply to all inventions, including those dealing with data.

"The term 'anticipation' in patent usage means that the invention was previously known to the public; that is, that it previously existed in the precise form in which it is claimed, including all of the limitations in the claim." SmithKline Beecham Corp. v. Apotex Corp., 439 F.3d 1312, 1324 (Fed. Cir. 2006) (Emphasis added.)

"A claim cannot be 'anticipated' by prior art that does not have all of the limitations in the claim." Helifix Ltd. v. Blok-Lok, Ltd., 208 F.3d 1339, 1346 (Fed. Cir. 2000) SmithKline Beecham Corp. v. Apotex Corp., 439 F.3d 1312, 1324 (Fed. Cir. 2006)

As discussed above, claim 18 has been amended to add that the input processor is configured to:

add static data to the data corresponding to the received invoices when processed into said standard intermediate form;

add dynamic data to the data corresponding to the received invoices when processed into the standard intermediate form; and,

validate the data corresponding to the received invoices when processed into the standard intermediate form before transmission by said transmitter to the party being invoiced.

In accordance with the invention, the invoice data received from individual sources are processed by an input processor (6a, 6b) that converts the input data into a standard intermediate form according to a mapping definition (6b) selected depending on the source of the data. The converted signals are held in a data warehouse. Subsequently, an output processor (9a), (9b) processes signals from the data warehouse depending on the destination according to a mapping definition that is selected depending on the destination.

Typically, senders of invoice data may not want to or may not be able to extract all of the information required from their local system in order to generate a legally compliant invoice. This is solved by feature (1) of amended claim 18, as the apparatus can augment the data received with additional information held for the individual sender as static data, in order to supplement the inbound data file.

As an example, a sender of invoice data would not normally send their own name, address and tax registration information in an invoice data file as this would traditionally be pre-printed on their own stationary and hence not be held in their system. However, it is often a legal requirement to include such name and address information in the invoice and therefore must be present in some jurisdictions.

On receipt of a data file from the supplier, the present invention as now claimed can check for the presence of name, address and tax registration information and if it not present, it can be retrieved from the client's profile and added to the data file in the standard intermediate form for processing and onward transmission. Also, some data components in the received invoice data are relationship based and the internally generated data needs to take into account, i.e., who has sent the data and who the receiver of the data will be. This is solved by feature (2) of amended claim 18. For example, within the receiver's system, the identity of inbound invoice data may be based on the sender's vendor code, held in the receiver's master file. The sender is not aware of code and therefore cannot provide it in their data. However, the invoice routing apparatus as now claimed permits a receiver of data to set up sender's aliases so that when a transaction is received from particular sender, the invoice routing apparatus

retrieves the receiver's code for the sender from a local store and adds this data to a specified field in the standard intermediate format so that when the output processor generates signals for transmission to the party being invoiced i.e. the receiver, they can contain code data that the receiver will recognize.

Claim 18 also includes a third feature (3) directed to validation of the data in the standard intermediate form before transmission to the party being invoiced. This ensures a high quality of data being supplied to the invoice parties, thereby resulting in a reduced failure rate for transmission of data.

Coleman does not disclose a system containing these features, precisely or any other way, and thus claim 18 and the claims depending therefrom are not anticipated by Coleman.

Moreover, there is nothing to lead one skilled in the art to include the above mentioned three features which now have been incorporated into claim 18, and claim 18 is not obvious over Coleman.

Based on the above, favorable consideration and allowance of the application are respectfully requested. However should the examiner believe that direct contact with the applicant's attorney would advance the prosecution of the application, the examiner is invited to telephone the undersigned at the number given below.

Respectfully submitted,
/WJS/
William J. Sapone
Registration No. 32,518
Attorney for Applicant(s)

Coleman Sudol Sapone P.C.
714 Colorado Avenue
Bridgeport, CT 06605
Telephone No. (203) 366-3560 Facsimile No. (203) 335-6779

MARKED UP SPECIFICATION PARAGRAPHS

On page 4, the paragraph extending from lines 14-30 is amended to read as follows:

Figure 1 is a generalised dataflow diagram of a system including a routing apparatus according to the present invention;

Figure 2 is a generalised dataflow diagram of a further system including a routing apparatus according to the present invention;

Figure 3 shows the elements of system employing an open systems interconnection (OSI) ~~OSI~~ layer 7 routing apparatus of the form illustrated in Figure 2;

Figure 4 illustrates the configuration of the web server machine of Figure 3;

Figure 5 is a flowchart illustrating a first method for the transfer of invoice data to the invoice routing system of Figure 3;

Figure 6 shows the user interface of an applet used in the method illustrated in Figure 5;

Figure 7 is a flowchart of a method of generating invoices using the invoice routing system of Figure 3;

Figure 8 is a flowchart of an input signal conversion process;

Figure 9 is a flowchart of an output signal conversion process; Figure 10 is a flowchart of a invoice file download process; and

Figure 11 illustrates a mapping definition file used by the system shown in Figure 3.

The paragraph on page 6, extending from lines 25-28, is amended to read as follows:

The present invention may be implemented at various layers of the International Standards Organization (ISO) ~~ISO~~ networking reference model. An application layer, i.e. layer 7, embodiment for the transfer of invoice data, including credit note data and the like, will now be described by way of example.

The two paragraphs on page 8, extending from line 10-15 are amended to read as follows:

The supplier, buyer, head office and fiscal authority computers 15, ... , 22 all interact with the invoice routing system 14 through the agency of the web server machine 23 and do not need to have software other than a Java ~~JAVA~~® software-enabled web browser in order to make use of the invoice routing system 14. (Java® is a registered trademark of Sun Microsystems, Inc.)

Referring to Figure 4, the web server machine 23 supports a web server 40 enabled for secure communication, e.g. using SSL (secure sockets layer), a plurality of computer graphics interface (CGI) CGI scripts 41, a file reception process 42 and a file transmission process 43.

On page 8, the paragraph extending from lines 22-30 is amended to read as follows: Referring to Figure 5, in order to upload invoice data to the invoice routing system 14, the operator of the first supplier computer 15 uses a web browser to "log in" to the web server 40 and establish a secure communication path (step s1). Having logged in, the operator can follow a hypertext link to an invoice file upload page (step s2). The file upload page includes a Java ~~JAVA~~ software applet. The ~~Java~~ applet is signed so that it has access to the file system of the first supplier computer 15. As shown in Figure 6, the applet's user interface includes a list box 50 for listing the files to be uploaded, a button 51 for opening a file selection dialog so that the operator can specify the invoice files to be uploaded and a button 52 for starting the file transfer.

On page 9, the paragraph extending from lines 17-23 is amended to read as follows: The third supplier computer 17 uses an automatic upload process. This process is triggered by scheduling software on the third supplier computer 17 and is effected by a Java ~~JAVA~~ software application which performs a file transfer protocol (FTP) transmission ~~FTP over an HTTP~~ a hypertext transfer protocol (HTTP) link to the web server machine 23 and prohibits operator intervention. The use of FTP over an HTTP link avoids the need for a direct FTP link between the third supplier computer 17 and the invoice routing system 14. The use of this, and the prohibition of operator

intervention increases system security.

The paragraph on page 13, extending from lines 1-6 is amended to read as follows:
Following the successful download of an invoice file, individual invoices are also sent to the respective buyer via e-mail in hypertext markup language (HTML) ~~HTML~~ format. These invoice copies may include data, such as value added tax (VAT) ~~VAT~~ registration numbers, that is not included the downloaded invoice file but which is required on printed invoices, which themselves may be a legal requirement.